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Plaintiff in Pro Per

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**Arjun Vasan,**  
Plaintiff,  
vs.  
**Checkmate.com, Inc.,**  
(dba “Checkmate”),  
Defendant.

Case No.: 2:25-cv-00765-MEMF-JPR

**SUPPLEMENTAL DECLARATION  
OF ARJUN VASAN IN SUPPORT OF  
OPPOSITION TO DEFENDANT’S  
MOTION TO DISMISS OR  
TRANSFER VENUE**

I, Arjun Vasan, submit this supplemental declaration to provide additional factual support in connection with my previously submitted opposition to Defendant’s Motion to Dismiss or Transfer Venue—filed via the Court’s Electronic Document Submission System (EDSS) on April 9, 2025, and is pending docketing.

1. On March 25, 2025, I received both a phone call and email from Stacey Chiu of K&L Gates LLP, acting on behalf of Defendant Checkmate.com, Inc. This outreach occurred just one day before Defendant’s response to my Complaint was due (March 26, 2025, per ECF No. 10).
2. I promptly responded to the email and took Ms. Chiu’s follow-up call in good faith. However, during the call, Ms. Chiu did not substantively engage

1 on the merits of the motion. She stated that her client intended to file “some  
2 sort of motion” regardless of any input I provided.

3 3. I noted during the call that this approach was inconsistent with Local Rule  
4 7-3, and this Court’s standing order, which requires a meaningful conference  
5 of counsel at least seven days prior to filing a motion. Ms. Chiu  
6 acknowledged that the seven-day period had not been observed, but asserted  
7 that her client’s position was irreconcilable with mine.

8 4. On March 26, 2025, Ms. Chiu filed a Declaration in Support of Defendant’s  
9 Motion to Dismiss or Transfer Venue, in which she claims I “agreed” that a  
10 meet and confer would be futile. This is inaccurate. I merely acknowledged  
11 that if her client was unwilling to consider clear and material evidence that  
12 contradicted its position, it was unlikely to change that position.

13 5. The call lasted approximately seven minutes and did not resemble a good  
14 faith attempt to meet and confer. Rather, it appeared to be a last-minute box-  
15 checking exercise, undertaken merely to comply superficially with the rule.

16 6. As a result of this procedural failure, I was forced to respond to a unexpected  
17 motion without the benefit of a proper and timely meet and confer process as  
18 envisioned by Local Rule 7-3 and this Court’s Standing Order. I believe this  
19 has caused me real prejudice in preparing my opposition.  
20

21 I declare under penalty of perjury that the foregoing is true and correct.  
22

23 Respectfully Submitted,

24 Dated: **Sunday, April 13, 2025**

25  
26 By:

*Arjun Vasani*

27 Arjun Vasani

28 Plaintiff In Pro Per